

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon Anita B. Brody

ORAL ARGUMENT REQUESTED

No. 14-00029-AB

**MOTION OF NONPARTIES CASE STRATEGIES GROUP, IT STRATEGIES GROUP,
CRAIG SIENEMA, JAMES MCCABE, LIBERTY SETTLEMENT SOLUTIONS, LLC,
LIBERTY CONTINGENT RECEIVABLES, LLC, LIBERTY SETTLEMENT FUNDING,
JMMHCS HOLDINGS, LLC, AND MARC HERMES TO CERTIFY QUESTIONS FOR
IMMEDIATE APPEAL AND FOR STAY**

This Court recently Granted in Part and Denied in Part Class Counsel's Motion to Compel Discovery from nonparties Case Strategies Group, IT Strategies Group, Craig Sienema, James McCabe, Liberty Settlement Solutions, LLC, Liberty Contingent Receivables, LLC, Liberty Settlement Funding, LLC, JMMHCS Holdings, LLC, and Marc Hermes (the "Movants"). [ECF No. 8366.] Movants, through their counsel, respectfully asks the Court to

amend its order and certify it for immediate appeal under 28 U.S.C. § 1292(b), as the Court expressly suggested it would permit Movants to do during the August 30, 2017 hearing. Movants also asks the Court to stay any and all discovery pending resolution of Movants' Motion for immediate appeal. In support of this motion, Movants incorporates by reference the attached Memorandum of Law.

Movants request oral argument on this motion.

Respectfully submitted,

Dated: September 15, 2017

By: /s/ Richard L. Scheff

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing Motion Certify Questions for Immediate appeal And For Stay was served on all counsel of record via the Court's ECF System on September 15, 2017.

/s/ Richard L. Scheff
Richard L. Scheff.